UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Transmittal Memorandum
Technical Review Workgroup Asbestos Committee

An interoffice workgroup convened by Office of Superfund Remediation and Technology Innovation

Transmitted via e-mail

Date: July 29, 2008

Subject: Draft Deliberative Comments on *Draft Phase I General Study Design for the Libby Asbestos Superfund Site Evaluation of Low-Level Libby Amphibole in Soils Inside and Outside the Libby Valley*

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To: Mary Goldade, US EPA Region 8

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At your request, a subcommittee of the TRW Asbestos Committee (members noted above) reviewed the *Draft Phase I General Study Design for the Libby Asbestos Superfund Site Evaluation of Low-Level Libby Amphibole in Soils Inside and Outside the Libby Valley* (dated June 30, 2008). The subcommittee has identified a number of significant concerns with the draft Study Design. In general, our concerns are related to the proposed efforts to characterize background soil concentrations of asbestos inside and outside the Libby Valley. We were less concerned with the proposal to develop methods for assessing low-levels of asbestos in soil.

We recognize that characterizing background soils is critical for assessing and managing risk; however, the current study design does not provide sufficient details about this important task. We believe that this proposal needs significantly

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more input and that the task warrants an intra-agency meeting like the ones held for the development of the Libby toxicological studies or the meeting for epidemiological studies. The importance and complexity of this project cannot be overstated, and we recommend that the Libby Management Team convene as soon as possible to discuss how to proceed.

Issues identified by the subcommittee:

1. It is unclear how several of the objectives relate to the Libby Human Health Risk Assessment. Also, it is not clear what would happen if one or more of the research objectives were not achieved (the low level PE soil sample effort, the low level soil method development, the modified glove box, modeling soil to air particles). How would this impact the risk assessment or ROD? Some of these research objectives have occupied OAQPS, ORD and CARB for many years (e.g. modeling soil to air PM 2.5 for PM SIP compliance or mechanical devices), and they still have much work to achieve.
2. The proposed study relies on the assumption that method(s) can be developed that will reliably predict the concentration of LA fibers in air given the concentration of LA in the soils. There is a strong possibility that the reliable relationship cannot be established.
3. While the TRW believes there is merit to the development of low-level soils method(s), direct characterization of a range of background soils with ABS may provide more appropriate information for risk characterization of background soils.
4. The study appears to assume that background soils are "low level' soils and does not support the possibility that background soils may also contain higher levels of LA and/or vermiculite.
5. The Mathematical Modeling of Anthropogenic Deposition needs more work and is not likely to provide useful results in time for the ROD.
6. The draft Study Design needs significant input from other groups (e.g., experts in air modeling, soil science, and geological history). The draft has a minimal discussion on soil formation (geology and soil science are two different disciplines) and influence on formation/transport of asbestos. The current draft contains inaccuracies. We would recommend that outside experts in soil science (e.g., Randy Southard and his UC Davis team of soil scientists and soil/PM 2.5 modelers), particle modeling (UC Davis and or OAQPS), and mechanical soil sampling (ORD Cincinnati. and/or the UC Davis team) provide input.
7. Acceptance and implementation of the draft study design may lead to changes in delineation of authority and responsibility for Superfund and States. In the past the States have had the lead to deal with issues of living in a NOA area. In 1981, OAR formalized that position in an FR notice that stated it was the States' responsibility for dealing with NOA issues involving unpaved roads in NOA areas. Montana, like California or Virginia, can pass rules governing (or develop information concerning) activities involving schools, home construction, quarried rock and use of fill material in NOA areas.

8. Other NOA issues addressed or implied by the Study Design require broader review (e.g., process for determining background, definition of background; what constitutes clean fill; implications of determining that 'background' contamination may pose a health risk).
9. The tight schedule did not permit the TRW asbestos committee to adequately review and comment on all of the technical issues.
10. The proposed study design appears to be beyond what would be a typical background investigation for a site. The proposal includes elements that implement a NOA investigation which may conflict with current or past regional efforts (R4, R9 & R10) at asbestos sites in NOA areas. It may also conflict with current OSWER/CERCLA policies (including 5-year reviews) concerning NOA sites (e.g. OSWER guidance to R9 concerning paving unpaved roads contaminated with NOA).